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ABSTRACT

In 1981 the Louisiana Board of Elementary and Secondary Education established regulations of quality assurance for educational program evaluations conducted in the state through two major areas: the certification of educational program evaluators and the use of the Joint Committee's Standards for Evaluation, Projects and Materials in the evaluations themselves. This paper discusses the issues that must be faced in developing an application mechanism, and in articulating the relationship between the certification of evaluators and quality assurance of evaluations. The role of the State Department of Education (SDE) and certified educators in the quality assurance effort in providing technical assistance and training in evaluation skills is also discussed. The role of the state in developing and disseminating models or guidance for local school systems is considered. The guidelines for implementing application of the Standards will be developed by the SDE Bureau of Evaluation in 1982. (PN)

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APPLICATION OF THE JOINT COMMITTEE STANDARDS AS CRITERIA FOR EVALUATIONS IN LOUISIANA

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APPLICATION OF THE JOINT COMMITTEE STANDARDS AS CRITERIA FOR EVALUATIONS IN LOUISIANA

Introduction

In January of 1981 the Louisiana Board of Elementary and Secondary Education (BESE) adopted Rule 3.01.70v(34) establishing the BESE's regulations of quality assurance for educational program evaluations conducted in the state. The Rule approaches quality assurance through two major areas: the certification of educational program evaluators and the use of adopted standards in the evaluations themselves.

Three items in these regulations address evaluation quality control. As approved by the BESE, these are:

1. The AERA Standards for Evaluation of Educational Programs, Projects and Materials should be used as the criteria for judging evaluations performed for and by the state and local education agencies in Louisiana for project evaluators.

2. The Standards should be monitored and implemented through a "Standards Checklist" which should be field-tested by the Department of Education and revised as needed by the Task Force on Program Evaluation. The "Standards Checklist" should be published for ready access to educators and evaluators in Louisiana.

3. Training in the application of the AERA Standards in the use of the "Standards Checklist" should be a part of the required inservice training program prior to entry in the Louisiana Program Evaluator Registry.

Guidelines for implementing the evaluator certification aspect of the regulation, adopted in June of 1981, led to some clarification and minor changes in the interpretation of the original Rule. The AERA Standards (referred to in the future as the BESE-adopted Standards, or Standards) were in fact those developed by the Joint Committee on

Standards for Educational Evaluation and published as the Standards for Evaluations of Educational Programs, Projects and Materials (1981). The Louisiana Program Evaluator Registry mentioned in item 3 above will not be published as originally titled. Certified evaluators will instead be registered in the sense that their certification is issued by the State Department of Education (SDE) Bureau of Higher Education and Teacher Certification. The Bureau of Evaluation also maintains and distributes a Directory of persons who have completed certification training although this is not published as a listing of "state approved" evaluators.

One final change from the original wording of the Rule is that the "Standards Checklist" described in items 2 and 3 was not developed, field tested and reviewed by the Task Force on Program Evaluation. Prior to its dismissal, the Task Force on Program Evaluation, which had advised the BESE in forming its regulations and guidelines, did not reach consensus about the content and structure of a checklist which could be used to judge evaluations on their adherence to the Standards. Those persons who participated in the original certification training were referred to an adaptation of the Citation Form which comprises Appendix B of the Joint Committee's Standards. At this point the Bureau of Evaluation is working with other SDE staff and Louisiana evaluators to develop guidelines through which the BESE-adopted Standards will be applied to evaluations. This paper will discuss the issues that must be faced in developing an application mechanism which is practicable, professionally acceptable, and in keeping with the intent of Rule 3.01.70v(34).

Objectives

This paper has three purposes. One, it will articulate the relationship between the two major areas of the BESE Regulation, certification of evaluators and quality assurance of evaluations. Two, it will discuss the possible role of the SDE and of certified evaluators in the quality assurance effort. Three, the paper will discuss issues in applying the Standards to educational evaluations in Louisiana. Evaluator certification and application of the Standards are interwoven as components in the total quality assurance effort, and personnel resources and audience needs will be as important in the application of the Standards as is the actual Regulation. The initial Task Force on Program evaluation, whose deliberations formed the basis of the BESE Regulations, included practicing evaluators from the SDE, local educational agencies, and the universities. The implementation of quality assurance must remain a similarly cooperative effort if it is to meet the BESE intent of improving evaluation products and use.

Relationship Between Certification and Quality Assurance

In addition to the statements concerning application of the Standards, the BESE Regulation included the qualifications for certification as a program evaluator. Two levels of evaluator were defined. Level A evaluators were defined as those persons who designed, approved, and directed educational evaluations; Level B evaluators, with less stringent coursework and experience requirements, were those who worked under the direction of a Level A. The guidelines to the Regulation stipulated that educational evaluations conducted for or by the SDE should be carried out under

the direction of a Level A evaluator. This is the basic relationship between the certification and quality assurance aspects of the Regulations: evaluations received by the SDE must meet the criteria of the BESE-adopted Standards and must be conducted by persons certified as having been trained in the application of these Standards.

At the recommendation of the SDE the six months following the adoption of Rule 3.01.70v(34) were set aside as a "grandfathering" phase. During this time the Bureau of Evaluation offered training in the Standards to all persons referred by the State Superintendent of Education or local Superintendents whose written job descriptions and current job responsibilities showed that they were functioning as Level A evaluators and that this was a major part of their professional responsibilities. Completion of the training led to certification as a Level A evaluator. Coursework, degree and work experience requirements were waived. This initial certification training and the characteristics of the evaluators certified during the grandfathering phase are discussed fully in another paper[1]. The participants in that training represented the most visible, active educational evaluators in Louisiana. Virtually all had completed graduate work beyond the baccalaureate, but their coursework included little formal training in evaluation. The majority had five or more years' experience as practicing evaluators and their job titles

[1] "Training in the Joint Committee Standards: Content, Process, and Outcomes." J. Rachal, Presented at AERA Annual Conference, New York, N.Y., 1982.

suggested that they worked primarily with federally funded categorical programs. About two-thirds saw themselves as independent or supervising evaluators and comparable proportions reported that they were responsible for all evaluation tasks with the exception of those relating to contractual matters. They did not expect their evaluation responsibilities to change in the immediate future. These findings suggested two disparities: that between formal training and practical experience, and that between formula monitoring of categorical programs and the comprehensive program evaluations reflected in the Standards.

Role of the SDE and Certified Evaluations in Quality Assurance

These disparties point out in turn two major areas in which SDE staff and other certified evaluators will be active in the application of the Standards. They are particularly important if the nature of educational evaluation changed in Louisiana. The Bureau of Evaluation has taken the stance that there is a qualitative distinction between evaluations of programs which include specific evaluation guidelines, such as Title I, to be followed by the local education agency evaluator and those for which the evaluator must design and implement an evaluation unique to a specific program or project. While both forms of evaluations will in all likelihood be required to demonstrate application of the Standards, the latter require considerably more sophisticated evaluator skills. Very simple compliance monitoring, such as showing that a given number of eligible clients received program-specified services in accord with fiscal stipulations, will probably not be included under the BESE Regulation.

As noted earlier, the certification workshop participants did not expect their evaluation responsibilities to change in the immediate future. Other factors suggest that they may well do so, and this will be measured in a Bureau of Evaluation study[2]. There are several indicators that more evaluation information will be demanded at the state level:

- When the Bureau of Evaluation was established two years ago it was given the responsibility of developing, with the Task Force on Program Evaluation, the BESE Regulations and Guidelines for quality assurance. Once these are in effect, they are likely to be used.

- Both the BESE and the state legislature have demanded evaluations of state-funded programs and projects, something rarely required in the past. Some of these, such as a $3,000,000 reading program, have required an evaluation conducted at the state level. Others, such as a cluster of pilot projects in compensatory education, have required both state and local evaluations.

- Louisiana has instituted what will probably prove to be the most comprehensive minimum competency testing program in the United States. Beginning with the 1981-1982 school year, all second grade students must take a state Basic Skills Test and subsequent grade levels will be added to the testing program at a rate of one per year until all grade 2-12 public school children are tested annually. This testing program is accompanied by the requirement that all children who fail to meet the required minimum performance level on the test will be provided with compensatory education. As well as participating in the state evaluation of the compensatory education program, all local school systems will be required to conduct local evaluations which address the Standards.

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[2] "Meta-evaluation of Education Evaluation in Louisiana: The Impact of Quality Assurance," W. E. Schroyer. Presented at AERA Annual Conference, New York, N.Y., 1982.

- Federal funding changes will in all probability lead to changes in federal evaluation requirements. As federal dollars flow through the SDE, the Bureau of Evaluation expects a greater demand on the part of the state legislature and the BESE for evaluation information from the local education agencies about program effectiveness.

In short, it is expected that within the next two to three years local school system evaluation requirements will increase and will require greater skills on the part of educational evaluators. Many of these will be the persons who are already certified with Level A status.

The arguments above project that the state will become a greater consumer of evaluations in the future and that the SDE will play an increased role in setting guidelines for, and demanding, local evaluations. The complement to this role is providing support for local evaluators. Table 1 shows the interest in future training among the 214 initial certification training participants. The great majority indicated at the close of the workshops that they would be interested in future voluntary workshops. The topics selected by the largest numbers were evaluation models (54%) and evaluation design (58%). Slightly fewer numbers wanted training in questionnaire construction, data gathering and manipulation, and surveys and sampling. The most frequently requested subjects were those specific to evaluation and which reflect total evaluation development rather than following prescribed guidelines.

TABLE 1. INTEREST IN FUTURE TRAINING, 214 PARTICIPANTS IN EVALUATOR CERTIFICATION TRAINING

	NUMBER	PERCENT
Interest in Future Voluntary Workshops in Evaluation Topics		
Yes	185	86%
No	9	4
No Answer	20	9
Topics of Interest		
Basic Statistics Review	79	37%
Intermediate Statistics Review	42	20
Evaluation Models	116	54
Evaluation Design	124	58
Questionaire Construction	112	52
Data Gathering/Manipulation	104	49
Surveys and Sampling	100	47
Report Preparation/Presentation	109	34
Other Topics	72	34
No Answer	12	6

Practicing evaluators were part of the Task Force on Program Evaluation and remained very active in the later certification training. From them, and from other professional networks which have arisen, has come a list of suggestions for providing technical assistance to practicing evaluators.

- The SDE could provide technical assistance to all evaluations required to meet the BESE-adopted Standards. This will occur to a limited degree, and is already a part of those evaluations conducted by the Bureau of Evaluation which require an additional local evaluation. Carried to extremes, however, this could result in the Bureau's acutally conducting all of the evaluations in the state and would obviate the need for the BESE quality ass rance regulations. It could also lead to potential conflict of interest.

- The SDE could provide training in evaluation skills. This will also be done. The Bureau of Evaluation is planning to offer a series of workshops in those evaluation topics requested most frequently during the certification workshops. Again, staff resources limit the extent of this inservice training and other Bureaus in the SDE do not possess the staff to do this. The Bureau's inservice training will be necessarily short and directed toward limited topics. It cannot address basic deficiencies or replace graduate level training.

- Universities could provide graduate level preservice and inservice education in evaluation. This is the best formal approach in the long run, but there may be a gap of several years between the need for evaluation skills and the presence of sufficient persons who possess them. At least four universities have expressed an interest in developing master's or doctoral programs in educational evaluation.

- Experienced evaluators could mentor those with less experience. This was suggested by several of the evaluators involved in the development of the Regulations and the certification training. Some of the larger school systems have research and evaluation components with experienced and trained staffs that smaller systems cannot afford; they are also able to assign staff to educational

evaluation rather than adding it as one more hat a single central office employee must wear. This suggestion should be pursued because it is a way of providing immediate and salient assistance and because it develops evaluation as a profession in Louisiana. The major constraint would be the amount of time that mentoring evaluators could provide. It also presupposes coordination and the willingness of local evaluators to share problems with others.

- Models or guidance could be developed locally and disseminated through the SDE. One mechanism for this could be the Louisiana Round Table of Program Evaluators. This is a group of local school system evaluators that has met informally for the past year and a half, and which recently prepared a short monograph on developing needs assessments. The Round Table is an excellent structure for identifying local needs and offering practical, nonacademic suggestions. A second mechanism is the SDE Bureau of Dissemination's "Promising Programs and Practices" file. This could be used to categorize and distribute model evaluations conducted by local evaluators and would serve as an incentive as well as an example.

All of these suggest ways to approach the training or information needs of practicing evaluators. They do not address the actual implementation of the BESE-adopted Standards.

Issues in Implementing the Standards

The guidelines for implementing application of the Standards have not yet been developed. They will be produced in the same way that the original Rule and guidelines for certification were: in early spring of 1982, study groups of local evaluators in the Northern and Southern parts of the state will meet to discuss ideas suggested by the Bureau of Evaluation. The suggestions of these study groups will be incorporated into the Bureau's plans and submitted to the BESE for its review and ultimate approval. At this point program

guidelines from the SDE (most notably for the Compensatory Education Program) require local education agency plans to address the BESE-adopted Standards. By the time that local systems begin implementing their evaluation plans the guidelines will have been written and distributed. Several issues (problems or simple background conditions) have already been identified by the Bureau of Evaluation and will be reflected in the eventual implementation guidelines.

1. Can the Joint Committee's Standards, adopted by the BESE, actually be implemented as criteria for judging the quality of evaluations?

   During the developmental workshop in June, 1981, several authors of the Standards trained a group of Louisiana evaluators in the Standards. Both the workshop presenters and the participants had some fears that applying the Standards as criteria of quality went against the original intent of the Joint Committee's publication. The Standards were not written as a "cook book" and using them as such could damage the evaluation profession by turning the Joint Committee into something like a licensing board or implying its sanction of poor quality evaluations. The guidelines will address this potential problem in three ways. First, the Bureau's staff has been in contact with representatives of the Joint Committee since the inception of the Louisiana quality assurance program and has thus maintained a professional linkage between Louisiana's actions and the larger professional field. Second, the guidelines will probably require that evaluation plans submitted to the SDE address each of the Standards, indicating which are to be applied and which appear to be of less importance or not applicable. Third, evaluations will also be judged holistically. The evaluation plans will, in effect, show which principles will be used in the evaluation and the overall judgment of the evaluation will determine whether the application of these principles resulted in a valid and adequate evaluation of the program. The Bureau's staff has already analyzed major categories of evaluations received by the SDE to determine which Standards are most likely to be crucial in each.

2. Which evaluations will be subject to the Standards?

The BESE Regulation is general enough to require that every evaluation performed for or by the state be judged by its application of the Standards, and the guidelines will narrow this definition to avoid a potential nightmare of cost, paperwork, and staff time. The qualification being considered by the Bureau is total program cost: limiting application of the Standards to programs funded at $50,000 or more. The rationale behind this is that a minimal evaluation of programs this large should be about 5% of the total cost, or $2,500. Adequate evaluations of smaller programs would require a disproportionate share of program funds and smaller evaluations would probably be unable to address the Standards adequately, as well as flooding the eventual judging group with paperwork.

If program cost is used to determine whether an evaluation must address the Standards there will still have to be exceptions. Both the legislature and the BESE must be allowed to require evaluations of programs they fund or approve, and program staff within the SDE who manage local programs must be granted the same prerogative. The last case is most likely when large amounts of SDE funds are distributed among a number of local school systems such that each receives less than $50,000. These evaluations which are exceptions to the funding limitation cut-off will probably require tandem evaluations, with those at the local evaluation coordinated or supplemented through an SDE evaluation of the total program.

3. Will there be a "cost backlash?"

This paper has already argued that there will in the near future be a greater demand for evaluation information from state groups approving and disbursing educational program funds. Most members of these groups have not been familiarized with the Standards and do not generally designate the amount of evaluation funds in program allocations. They, and SDE program staff, are often surprised at the cost of an adequate evaluation. The application guidelines should include some recognition that evaluations cannot be done for free, but the Bureau of Evaluation will also have to do a good bit of education among evaluation users. Part of

the rationale behind the BESE-approved grandfathering certification period was to ensure that local educational agencies and SDE Bureaus had a supply of Level A evaluators and were not required to spend large sums on third-party evaluators. A second means of reducing cost will be to allow local evaluations of SDE-managed programs to cite the SDE program director or staff as the supervising Level A evaluator.

4. What sanctions will be employed in applying the Standards?

The BESE Regulations state simply that the adopted Standards "should be used as the criteria for judging evaluations." The guidelines must go beyond this and state that the Standards must be applied, in an acceptable manner, and to an acceptable degree. The other side of that coin is determing what will happen if they are not. The first step is the program approval stage: local or state program plans can be required to include an evaluation plan which shows how the evaluation will address the Standards. These plans can be negotiated until an acceptable evaluation is proposed, and there are precedents for such negotiations in other state programs. The subsequent steps are in judging whether an evaluation was actually conducted according to plan, and whether these activities resulted in an adequate evaluation. There is no guarantee that a "yes" at each step promises a "yes" at the following one. The most likely sanctions are fiscal. Inadequate plans can lead to the refusal to fund until an acceptable plan has been submitted. Program funds (if they are not totally distributed up front, as is the common practice) can be withheld if evaluations are being conducted out of compliance with the plan. Refunding can be denied if the final evaluation product is not acceptable. These are possible sanctions which may not be acceptable to the BESE. They also require constant monitoring on the part of the program's funding or managing staff, close cooperation between program and evaluation personnel, and local school system staffs with the time and expertise to carry out good evaluations.

Sanctions include rewards as well as punishments, and three come immediately to mind. The first, and most difficult, is to promote the usefulness of evaluation information. The most typical current evaluations are those of federal categorical programs, such as Title I, which provide little

useful data to local program staff. The manner in which the Standards are implemented should attempt to make evaluations as useful to those conducting them as is possible, by integrating local evaluations with planning needs, public relations efforts, ongoing program management requirements, or other areas. A second reward lies potentially in public recognition of outstanding programs and good evaluations. This could be coordinated with the SDE's established dissemination activities. The third possible positive outcome is the development of a professional network of evaluators. The Louisiana Round Table of Evaluators has continued for a year and a half with no stated purpose other than sharing professional problems and interests. During that time the meetings have been devoted to specific topics reflecting members' work (evaluation use, item analysis in testing, needs assessment) and to open discussion with SDE staff about state programs affecting the local education agencies. The great majority of Louisiana's school systems have one person responsible for evaluation in addition to other duties, and the Round Table members have said that they come to the meetings to talk to others who know what they do. Recognizing evaluation as a profession and providing professional conversation is not a weak incentive.

5. Should the implementation mechanism be model based or model-free?

The guidelines could allow the SDE to require that local evaluations adhere to one of a list of classic models but will in all probability not do so. Prescribing models would chill the development of local evaluation skills, remove the process of evaluation design development which is seen as crucial to information usefulness, and reduce the SDE's role to a monitoring one. However, the simple act of writing guidelines which specify how the Standards are to be addressed, and what will be the criteria for acceptable evaluations, creates a de facto model in itself. Since the Standards were not developed to comprise an evaluation model there is an inherent contradiction in the process. But without some fairly specific guidance the implementation could become a frustrating experience for local evaluators seeking to satisfy a state agency which refuses to say precisely what it wants.

6. What will be the accountability mechanism?

The procedures for judging evaluation plans and products may not include the conceptual difficulties of other issues, but they could turn out to be unmanagably complex in their operation. In all likelihood the Bureau of Evaluation will be ultimately accountable for all evaluations covered by the guidelines. Some state programs, such as Compensatory Education, will be evaluated directly by the Bureau, which will prepare and present the final evaluation report. In such programs the Bureau can (a) approve local or third-party evaluations (b) conduct an evaluation which is coordinated with required local evaluations or (c) conduct an independent evaluation. In all of these cases the Bureau must coordinate its requirements and activities with both SDE program management staff and with local educational agency staff. The second category of programs are those reflected in federal grants, in which an SDE staff typically signs off on received reports. In these cases the SDE program personnel can serve as the responsible Level A evaluator. However, the Bureau of Evaluation is charged with responsibility for the quality assurance program and must have some developmental, review, or monitoring function in those evaluations with which it is not directly involved. Here the coordination may prove to be even more difficult; while control is reduced by distance from the evaluation activities, responsibility is not.

Two options have been considered by the Bureau of Evaluation for applying the Standards to local evaluations. The first is the inclusion of a checklist that would enumerate all of the Standards, indicating which were addressed and which were not. The second is the development of a general report format that incorporates the Standards without specifying an evaluation model. Either of these could be reviewed in the same ways. At the local level, evaluations could be reviewed by a Level A evaluator from the same school system or from another school system. The SDE could also provide a technical assistance or monitoring team to review evaluations locally. The first set of possibilities would have the great advantage of encouraging local involvement and legitimizing the professional role of local evaluators, but could not be a final step in the accountability process. The second set could conceivably take care of accountability, if the

SDE teams were periodically monitored, but would require adding to SDE staff.

At the state level, evaluations could be reviewed by the recipient of the report. Review guidelines would likely have to be developed by the Bureau of Evaluation, which would also need to supply technical assistance to other SDE staff. A second possibility would be for the Bureau to review all evaluations. This would mean a considerable increase in staff size and would put the Bureau in a watchdog role it may not wish to assume. It would also increase the distance between evaluation production and use by program staff. A third potential method would be to have evaluations reviewed by a panel of recipients. This adds more program staff input and increases the chance that evaluations will be judged holistically rather than as compliance activities. It also increases the burden on program staff time. Involvement of Bureau of Evaluation staff in such a review panel would meet the accountability requirement, as would such involvement in the two final suggestions: review by a panel of local education agency evaluators or by a panel employed for this purpose. Using local evaluators would certainly contribute to the overall quality of evaluation in Louisiana, but could raise some problems in asking school systems to provide staff release time or using non-SDE judgments in deciding whether or not sanctions should be taken against a program. The last suggestion would be costly, and while it might encourage objectivity would not develop local commitment or skills.

Conclusions

Although these issues have been broken out in clusters to organize their discussion, they are certainly not independent. The consideration of sanctions will be a part of accountability, the determination of programs subject to evaluation quality assurance will be a key component in deciding how the implementation mechanism will work, and the question of whether or not the Standards can be applied underlies all of the other decisions. And, while Louisiana is

unique in its evaluation quality assurance program, the problems it faces in implementing this would be applicable to other states considering a similar program. The BESE-adopted Standards will be applied to evaluations conducted in Louisiana. The guidelines under which this is done will include both compliance and technical assistance components. They will also attempt to implement quality assurance in a way which is professionally sound, not unduly burdensome for local school systems, and will improve the quality of evaluation processes and products in the state.